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*Attorneys for the Debtors and
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re:
LEFEVER MATTSON, a California
corporation, *et al.*,¹
Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

**DECLARATION OF ETHAN CONRAD
IN SUPPORT OF ADEQUATE
ASSURANCE OF FUTURE
PERFORMANCE WITH RESPECT TO
THE ASSUMPTION AND ASSIGNMENT
OF EXECUTORY LEASES AND/OR
UNEXPIRED CONTRACTS IN
CONNECTION WITH THE SALE OF
7456 FOOTHILLS BOULEVARD,
ROSEVILLE, CA 95747**

[No Hearing Requested]

¹ The last four digits of LeFever Mattson's tax identification number are 7537. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>. The address for service on the Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 95621.

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1 I, Ethan Conrad, declare as follows, pursuant to 28 U.S.C. § 1746:

2 1. I submit this declaration (the "Declaration") with respect to the assumption and
3 assignment of executory leases and/or unexpired contracts (the "Agreements") in connection with
4 the sale of the real property located at 7456 Foothills Boulevard, Roseville, California 94747,
5 commonly known as Woodcreek Plaza, from the above-captioned debtors and debtors-in-
6 possession (collectively, the "Debtors") pursuant to the Purchase and Sale Agreement dated
7 June 19, 2025 (the "Purchase Agreement") attached as Exhibit A to Exhibit 1 to the *Notice of Sale*
8 *of 7456 Foothills Boulevard, Roseville, CA 95747*, filed concurrently herewith.

9 2. Except as otherwise indicated herein, the facts set forth in this Declaration are based
10 upon my personal knowledge, my review of relevant documents, information provided to me, or
11 my opinion based upon experience, knowledge, and information concerning my finances. If called
12 upon to testify, I would testify to the facts set forth in this Declaration.

13 3. I am the purchaser of the Subject Property.

14 4. I have lived in the greater Sacramento area for over 35 years and have been in the
15 commercial real estate industry for the last 33 years.

16 5. I have significant experience in purchasing and owning properties similar to this
17 one. I own over 12,000,000 square feet of commercial real estate totaling over \$2 billion with
18 over 2,200 tenants in the Greater Sacramento Area and Central Valley.

19 6. I have reviewed the financial information for the Subject Property provided by the
20 Debtors, and I am capable of meeting the financial obligations of the Agreements.

21 7. I am willing and able to perform my obligations under the Purchase Agreement and
22 the assigned Agreements.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

25
26 Dated: 7/17/2025 | 18:07:07 PDT

DocuSigned by:

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Ethan Conrad